JAN 30 2012 FCC Mail Room

AirWaves Communications Inc. 4801 Lamar Ave. Paris, Texas 75462

Federal Communications Commission Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, DC 20554

> RE: Annual 47 C.F.R. 64.2009 (e) CPNI Certification for 2011 EB Docket No. 06-36 AirWaves Communications Inc. FRN No. 0001658434 Form 499 Filer ID 815338

I, Mike Smith, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures effective during the calendar year 2009 and to the present that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. 64.2001 et seq. of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement that (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R. 64.2001 et seq. of the rules, (ii) explains any actions taken against data brokers during the past year, (iii) summarizes all customer complaints received in the past year concerning the unauthorized release of CPNI and (iv) reports information known to the company regarding tactics pretexters may be using to attempt to access CPNI.

Name: Mike Smith

Title: Officer (President)
Date: January 23, 2012

Vile front

He of Grenies mora 0+4

AirWaves Communications Inc. FRN No. 0001658434 Form 499 Filer ID 815338 CPNI Certification

Statement

AirWaves Communications Inc. ("Carrier") has established operating procedures that ensure compliance with the Federal Communications Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI

Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by the Carrier.

Carrier maintains record of its and its affiliates' sales and marketing campaigns that use its customers CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The records includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Carrier compliance for a period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding CPNI, and a process ensures that opt-out elections are recorded and followed.

Carrier took the following actions against data brokers in 2011 and to the present, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission. NONE

The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and {if any} what steps carriers are taking to protect CPNI: Carrier has determined that no pretexter has attempted to access CPNI on Carrier's system.

The following is a summary of all customer complaints received in 2011 and to the present regarding the unauthorized release of CPNI:

Number of customer complaints Carrier received in 2011 and to the present related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: NONE Category of complaints:

- 0 Number of instances of improper access by employees
- 0 Number of instances of improper disclosure to individuals not authorized to receive the information
- 0 Number of instances of improper access to online information by individuals not authorized to view the information
- 0 Number of other instances of improper access or disclosure

Description of instances of improper access or disclosure: NONE

OPERATING PROCEDURES TO ENSURE COMPLIANCE WITH THE FCC CPNI RULES

Attached hereto to the extent applicable is a summary of rules and procedures to follow with respect to Network and Systems owned and operated by Airwayes Communications, Inc. as it involves Customer Proprietary Network Information ("CPNI") and Other Customer Information under applicable FCC rules.

You are to review and read the attached and should you have any questions, please contact Mike Smith, President, at:

Airwaves Communications, Inc. 4801 Lamar Avenue Paris, Texas 75462

IT IS THE POLICY OF AIRWAVES COMMUNICATIONS TO NOT RELEASE ANY CUSTOMER PROPRIETARY NETWORK INFORMATION FOR ANY REASON AND ALL EMPLOYEES ARE TRAINED ON AND ADHERE TO THIS POLICY.

- 1. No disclosure of CFNI information to any party is permitted by any employee or agent of the Company without following the CFNI procedures and rules established by the Company. In this respect, given the current network operations of the Company, all such information to be provided will require the express prior approval or consent of the managers and/or officers of the Company.
- You must protect against attempts by any party to gain unauthorized access to CPNI. Before any access is permitted, you must properly authenticate a customer prior to disclosing CPNI based on information or customer initiated telephone contact, on-line account access or, if applicable, in store visit.
- 3. Since the Company does not currently provide a password to customers, the Company may only disclose (if applicable) call detail information by sending it to the customer's address of record, or by calling the customer at the telephone of record.
- 4. If the customer is able to provide call detail information to the Company during a customer-initiated call without the carrier's assistance, then you are permitted to discuss the call detail information provided by the customer.
- 5. If applicable, the Company may disclose CPNI to a customer (if applicable) who at a carrier's retail location (if applicable), first presents to the telecommunications carrier or its agent a valid photo ID matching the customer's account information.
- 6. Please note, the above rules may be modified for Business

Customers of the Companies pursuant to the terms of a Contractual Agreement which addresses the issue of customer information in authentication and requires where a Subscriber has a designated account representation and the matter is addressed by such contract.

- 7. There are specific notification requirements and procedures to law enforcement authorities which must be followed if there is a breach of customer's CPNI. See attached \$64.2011.
- 9. Please review the attached CPNI rules and procedures.
- You may ask a Company Manager or Officer to review with you any questions you may have with respect to the procedures est forth herein.
- 10. Although as a whole the communication service provided by the Company is not interconnected service to the PSTN or VOIP, you must still recognize the importance of protecting to the extent if applicable Customer Proprietary Network Information.
- 11. Report any evidence of wrongful or illegal activity with respect to CPNI to the Company c/o Nike Smith, Airwaves Communications, Inc. 4801 Lamar Avenue, Paris, TX 75462, telephone (903) 765-8881.

AirWaves Communications Inc. 4801 Lamar Ave. Paris, Texas 75462

Chief, Telecommunications Consumers Division Enforcement Bureau Federal Communications Commission 445 12th Street, S.W. Room 4-C244 Washington, D.C., 20554

> RE: File No. EB-08-TC-2905 NAL/Acct. No. 200932170202 FRN No. 0001658434

> > Consent Decree Section III. TERMS OF AGREEMENT

10. Compliance Plan.

I, Mike Smith, hereby submit a copy of the annual section 64.2009(e) compliance Certificate for 2011 filed annually in EB Docket 06-36 by AirWaves Communications Inc., FRN No. 0001658434, Form 499 Filer ID 815338.

Name: Mike Smith Title: Officer (President) Date: January 23, 2012 AirWaves Communications Inc. 4801 Lamar Ave. Paris, Texas 75462

Best Copy and Printing, Inc. 445 12th Street, Suite CY-B402 Washington, DC 20554

> RE: Annual 47 C.F.R. 64.2009 (e) CPNI Certification for 2011 EB Docket No. 06-36 AirWaves Communications Inc. FRN No. 0001658434 Form 499 Filer ID 815338

Attached is a copy of the 2011 CPNI filing by our company.

Name: Mike Smith

Title: Officer (President)
Date: January 23, 2012